

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

In re:

Case No. 8:19-bk-08217
Chapter 11

Richard Trimble Conard and
Elizabeth Ann Conard,

Debtors.

CHAPTER 11 CASE MANAGEMENT SUMMARY

COME NOW the Debtors, RICHARD TRIMBLE CONARD and ELIZABETH ANN CONARD, by and through undersigned counsel, and file this their Chapter 11 Case Management Summary in accordance with the Local Rule 2081-1 in this matter as follows:

1. Richard Conard is engaged in operating two business, Nelco Realty Holdings, Inc., and Senior Living Services, LLC. Elizabeth Conard is retired.

2. The Debtor filed for Chapter 11 protection as a result of a lawsuit pending in the Circuit Court of the Twelfth Judicial Circuit, in and for Manatee County, Florida, styled as *Virginia A. Dorris v. Nelco Realty Holdings, Inc., Pinnacle Partners of Manatee, LLC, Richard T. Conard, and Frederick N. Clark*, Case No. 2018 CA 6087, that sought to impose a receivership against the Debtor. Also, the Debtors have significant outstanding judgments against them as well as other ongoing litigation.

3. Richard T. Conard is President of Nelco Realty Holdings, Inc., a Chapter 11 Debtor who has filed under Case No. 8:19-bk-08216 in this court and he has full authority to manage and operate Nelco. He draws no salary from Nelco. No pre-petition wage claims exist against Nelco. Dr. Conard is Nelco's sole shareholder. Dr. Conard and the Nelco have identical interests in this case and have selected the undersigned to represent them both. Frederick Clark,

the Nelco's Vice President and former shareholder, is also filing a Chapter 7 bankruptcy using the undersigned as his counsel.

4. The Debtor had income of \$105,746.00 in business income in 2017 and Social Security Income of \$40,620.00 and interest income of \$1,070.00. Income for 2018 and 2019 is in the process of being determined by the Debtors' accountant, FAAS Accounting, of Athens, Ohio, for which an application for employment will be brought in this court.

5. The Debtors owe their unsecured creditors approximately \$3,402,626.88, of which in excess of \$2,700,000.00 is disputed. Secured creditors, including those with avoidable judgment liens, are owed \$1,018,677.08.

6. The Debtors have outstanding tax debts in the estimated approximate amount of \$23,196.45 for tax year 2017.

7. The Debtor anticipates continuing to operate his business, Nelco Realty Holdings, Inc., and Senior Living Services LLC during the pendency of this case.

Dated on this the 5th day of September, 2019.

COLE & COLE LAW, P.A.

/s/ Richard John Cole, III
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Chapter 11 Case Management Summary has been served by either electronic submission or United States Mail on this the 5th day of September, 2019, to the following:

Office of the U.S. Trustee
501 E. Polk Street, Suite 1200

Tampa, FL 33602

/s/ Richard John Cole, III

Richard John Cole, III